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**UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION**

LOUJAIN HATHLOUL ALHATHLOUL,

Plaintiff,

vs.

DARKMATTER GROUP, MARC BAIER,
RYAN ADAMS, and DANIEL GERICKE,

Defendants.

Case No. 3:21-cv-01787-IM

**JOINT MOTION FOR EXTENSION OF
TIME TO COMPLETE LIMITED
JURISDICTIONAL DISCOVERY**

LR 7-1 CERTIFICATION

Undersigned counsel conferred with Plaintiff's counsel. This is a joint motion.

JOINT MOTION

The parties jointly move for an extension of time to complete the limited, jurisdictional discovery that the Court ordered in this matter. *See* ECF Nos. 80, 88. The current deadline to complete that discovery is September 9, 2024. As set forth below, good cause supports an extension of that deadline to October 31, 2024.

Plaintiff already has conducted the continued, limited Rule 30(b)(6) deposition of

defendant DarkMatter's corporate designee. Plaintiff and DarkMatter have been conferring about a discovery dispute related to that deposition. They have reached an agreement to attempt to resolve that dispute without Court involvement and are in the process of conferring in that regard.

These developments and the schedule of undersigned counsel necessitate conducting the Individual Defendants in late September and into October. Counsel for the Individual Defendants has jury duty the week of September 9, is visiting a relative in hospice immediately thereafter, will be in trial in Washington County from September 24 to October 1, and then out of the country on a prepaid trip, in a country in which none of the defendants resides, from October 2 to October 18. Accordingly, the parties have agreed to schedule the Individual Defendants' depositions on September 20, October 22, and October 24.

For these reasons, the parties jointly and respectfully request that the Court extend the deadline for limited jurisdictional discovery to October 31.

DATED this 30th day of August, 2024.

SNELL & WILMER L.L.P.

/s/ Clifford S. Davidson

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*Attorneys for Defendants Marc Baier, Ryan
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DATED this 30th day of August, 2024.

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DATED this 30th day of August, 2024.

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